

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

GE HFS HOLDINGS, INC.
Formerly known as
HELLER HEALTHCARE FINANCE,
INC.,

Plaintiff,

and

MICHAEL INGOLDSBY,

Intervenor/Plaintiff,

v.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA, and
INTERNATIONAL INSURANCE
GROUP, LTD.,

Defendants.

CIVIL ACTION No: 05-CV-11128-NG

**PLAINTIFF-INTERVENOR MICHAEL INGOLDSBY'S MOTION
FOR LEAVE OF COURT TO FILE A MEMORANDUM OF
LAW IN EXCESS OF TWENTY PAGES**

NOW COMES the Plaintiff-Intervenor Michael Ingoldsby in the above-entitled action and, pursuant to Local Rule 7.1(b)(4), respectfully requests that this Honorable Court allow him to submit a twenty-five (25) page Memorandum of Law.

In support hereof, the Plaintiff-Intervenor states that his Memorandum of Law is both an opposition to National Union's Motion for Summary Judgment and a memorandum of law in support of the Plaintiff-Intervenor's Cross-Motion for Summary Judgment. Rather than filing a separate memorandum of law in support of the Plaintiff-

Intervenor's Cross-Motion, the arguments are consolidated into one brief. As such, the additional five (5) pages are necessary to support the issues set forth in both the opposition and the cross-motion.

WHEREFORE, the Plaintiff-Intervenor respectfully requests that this Honorable Court allow him to file a Memorandum of Law in excess of twenty pages.

Respectfully submitted,
MICHAEL INGOLDSBY,
By his attorney,

/s/ Gregory J. Aceto, Esq.
Gregory J. Aceto, Esq.
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Dated: November 30, 2006